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13 *Industrial Co., Ltd.), Panasonic Corporation of North America, and MT*
Picture Display Co., Ltd.

14
15 **IN THE UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

17
18 **Case No. 07-5944 SC**
MDL No. 1917

19 **In re: CATHODE RAY TUBE (CRT)**
20 **ANTITRUST LITIGATION**

DECLARATION OF FUMIO OHTSUBO
IN SUPPORT OF MOTION FOR
PROTECTIVE ORDER QUASHING
DEPOSITION

21 This Document Relates to:

Date and Time: December 13, 2013; 10 A.M.
Court: Courtroom 1, 17th Floor
Judge: Hon. Samuel Conti

22 **INDIRECT PURCHASER, DIRECT ACTION**
23 **PLAINTIFF, AND CALIFORNIA**
24 **ATTORNEY GENERAL ACTIONS**

DECLARATION OF FUMIO OHTSUBO

I, Fumio Ohtsubo, hereby declare, pursuant to 28 U.S.C. § 1746, that the following is based upon my personal knowledge:

1. I am a citizen of Japan and reside in Nara Prefecture, Japan.

2. This Declaration is submitted in support of the Motion for Protective Order Quashing Deposition filed by Defendants Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.), Panasonic Corporation of North America, and MT Picture Display Co., Ltd. (collectively, the "Panasonic Defendants").

3. I have worked at Panasonic Corporation ("Panasonic") since April 1971. A true and correct copy of my résumé is annexed hereto as Exhibit "A".

4. Panasonic is a multinational corporation employing tens of thousands of people.

5. From June 1998 through June 2013, I was a member of Panasonic's Board of Directors (the "Board").

6. From June 2002 through March 2006, I was the President of Panasonic AVC Networks Company ("PAVC"),¹ a division of Panasonic. PAVC was responsible for manufacturing, among other things, audio, video (including televisions), computer, and camera products. During my time as its President, PAVC employed over ten thousand people. At various times during my tenure as PAVC's President, I also oversaw Panasonic's Storage Devices Business, Digital Network Strategic Planning Office, and Matsushita Fujisawa Manufacturing Center.

7. From June 2003 through June 2006, I also served as one of Panasonic's Senior Managing Directors.²

8. From June 2006 through June 2012, I served as Panasonic's President.

9. From June 2012 through June 2013, I was Chairman of the Board.

10. I currently serve as a Special Corporate Advisor of Panasonic.

¹ During the period from June 2002 through December 2002, PAVC was known as AVC Company. On October 1, 2008, PAVC's name was changed to AVC Networks Company.

² At all times during this period, Panasonic had either three or four Senior Managing Directors.

13. I did not attend any meetings with Panasonic's competitors in the CRT industry at which competitively sensitive information was shared, nor did I receive reports concerning such meetings or otherwise learn of them prior to the governmental investigations that led to the CRT Case.

15. I have only very high-level knowledge of Panasonic's CRT business, and the limited knowledge that I have is not unique to me.

Executed this 16th day of October, 2013, at Osaka, Japan.

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DECLARATION OF FUMIO OHTSUBO IN SUPPORT OF
MOTION FOR PROTECTIVE ORDER OUASHING DEPOSITION

Exhibit A

As of Jun 26, 2013

Biographical Data

Fumio Ohtsubo
Special Corporate Advisor
Panasonic Corporation

Date of Birth: September 5, 1945

Diploma:

Master of Sciences in Mechanical Engineering, Kansai University (Mar. 1971)

Business Career:

Apr. 1971	Joined Matsushita Electric Industrial Co., Ltd. (Currently, Panasonic Corporation)
Nov. 1987	Director, New Business Development Office, Audio Video Sector
Jan. 1989	Managing Director, Matsushita Electronics (S) Pte. Ltd.
Jul. 1995	Director, Audio Division
Jun. 1998	Director, Member of the Board Vice President, AVC Company (In charge of Audio and Optical Disc Business)
Jun. 2000	Managing Director, Member of the Board Vice President, AVC Company (In charge of AVC Network Group)
Jun. 2001	Senior Vice President, AVC Company (Group Executive, AVC Network Group)
Jun. 2002	President, AVC Company
Jun. 2003	Senior Managing Director, Member of the Board
Jun. 2006	President, Matsushita Electric Industrial Co., Ltd.
Jun. 2012	Chairman of the Board, Panasonic Corporation
Jun. 2013	Special Corporate Advisor, Panasonic Corporation